

## EPPC

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## Dry Cleaners & RCRA



This publication is to assist you with your concerns about dry cleaners and Resource Conservation and Recovery Act (RCRA). It is intended for **informational purposes only** and **cannot** be substituted for the regulations themselves. In each section, a regulatory reference has been included to aid you in locating the specific cite regulation. We encourage you to use this information as a companion to the regulations. However, questions which are not clearly addressed within this document should be researched directly with the Hazardous Waste Branch (HWB), Division of Waste Management.

In order to assist dry cleaners in Kentucky with regulatory compliance, HWB has developed this publication to provide the applicable regulations, recordkeeping, and reference information in one document for the convenience of facility owners and operators. Completions of the monthly recording logs are necessary for the dry cleaner to ensure that operations are being conducted in a manner that complies with environmental regulations.

In addition, be aware that other state regulations could apply to your business besides RCRA regulations. Please contact the Division for Air Quality and Division of Water to receive information regarding the Clean Air Act and the Clean Water Act, respectively.

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If you have any comments or suggestions for improvements to this publication, please contact HWB at 502-564-6716, ext. 676.

### **Disclaimer**

This document was prepared in August 2007 and is based on statutes and regulations in effect at that time. The reader should not rely solely on this fact sheet for regulatory compliance and should instead review the most current statutes and regulations.

### **Liability Limitations**

The information compiled in this document is being provided by EPPC as a service to Kentucky dry cleaning facilities. Although effort has been made to ensure the accuracy and completeness of this information, the publisher, authors, and reviewers of this document cannot be held liable for any errors, omissions, or interpretations of regulations described herein. The regulatory status and regulatory interpretations mention here may change without individual notice to dry cleaner.

### **Acknowledgments**

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## **Acronyms**

CESQG	Conditionally Exempt Small Quantity Generator
EPPC	Environmental and Public Protection Cabinet
DAQ	Division for Air Quality
DEP	Department of Environmental Protection
DOW	Division of Water
DWM	Division of Waste Management
HBW	Hazardous Waste Branch
LQG	Large Quantity Generator
MSDS	Material Safety Data Sheet
OSHA	Occupational Safety and Health Administration
perc	perchloroethylene solvent
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
SQG	Small Quantity Generator
TCLP	Toxicity Characteristic Leaching Procedure
US EPA	United States Environmental Protection Agency

## Hazardous Waste and Dry Cleaners

The most commonly used solvents in the dry cleaning industry are:

- Perchloroethylene (also known as tetrachloroethylene or "perc");
- Valclene® Solvent or Fluorocarbon 113;
- Petroleum solvents; and
- Trichloroethane.

During the cleaning, extraction and drying process, dry cleaners may produce one or more of the following wastes:

- Filters and filter media;
- Separator water;
- Spent solvents and solvent containing rags (from spill cleanup);
- Spent carbon and cartridges from carbon absorbers; and
- Cook powder residues
- Still residues from distillation units
- Spot Cleaner

### Examples

*Hazardous wastes from perchloroethylene plants include:*

- Still bottoms from solvent distillation (the entire weight)
- Spent filter cartridges (total weight of the cartridge and remaining solvent after draining)
- Cooked powder residue (the total weight of drained powder residues from diatomaceous or other powder filter systems after heating to remove excess solvent)

*Hazardous wastes from Valclene® plants include:*

- Still bottoms from solvent distillation (the entire weight)
- Spent filter cartridges (total weight of the cartridge and remaining solvent after draining)

**References: 401 KAR 31:040, Section 2 and 401 KAR 31:030**

*Hazardous wastes from petroleum solvent plants include:*

- Still bottoms from solvent distillation (the entire weight)

Most dry cleaners generate hazardous waste. Hazardous wastes are classified in two ways according to the regulations. To be a regulated hazardous waste, the material must either be **listed** as a hazardous waste (**401 KAR 31:040**) or exhibit at least **one or more of the four hazardous waste characteristic:** ignitable, corrosive, reactive and toxic (**401 KAR 31:030**).

Listed hazardous wastes are listed by name or process in the Kentucky Administrative Regulations (KAR) specifically on 401 KAR 31:040. For example, perchloroethylene or perc used in dry cleaning is a listed hazardous waste with a hazardous waste code of F002 when it become a waste or is spent. However, perc has the waste code U210 as a pure commercial chemical product if discarded prior to use or if there are discarded residues from the original manufacture container. Also, spill residues from the cleanup of perc product spills are also considered to be U210 hazardous waste. Another example of a listed waste is Valclene® (trichlorotrifluoroethane), which is identified with the EPA waste code F002).

Any other waste coming in contact with a listed waste also becomes a listed waste by virtue of what is known as the "mixture rule." This includes wastes such as filters, filter media, sludge, and other containing perc.

A characteristic waste exhibits one or more of the four hazardous characteristics (ignitability, reactivity, corrosivity and toxicity) as defined in 401 KAR 31:030. For example, a waste

solvent exhibits the characteristic of ignitability if it has a flashpoint below 140 °F.

The characteristic of toxicity is determined by use of the Toxicity Characteristic Leaching Procedure (TCLP). This analytical test simulates the acidic conditions found in a landfill and determines how much of certain regulated substance would leach from the waste if placed in a landfill. Regulatory levels are set for 40 hazardous constituents (**401 KAR 31:030**) in terms of parts per million, and any waste exceeding these levels is a toxic hazardous waste.

Note: If you use a petroleum solvent (like Stoddard Solvent), you should check with your sales representative to determine the scientific names of the chemicals used in the formulation. Once you know the scientific names of the chemicals, you can contact the state agency to help you find the correct EPA waste number. Almost all dry cleaning solvents are listed and use the F002 EPA waste code.

## **How Do You Know If You Are Regulated Under RCRA?**

### **Are you subject to the regulations?**

If your company generates waste as part of a manufacturing or industrial process, you might be subject to hazardous waste regulations. You must determine whether you generate hazardous wastes and are subject to regulation. Your company is responsible for making hazardous waste determinations correctly.

The hazardous waste regulations can be found in Title 401 of the Kentucky Administrative Regulations (KAR) Chapters 30 to 39, which are available at many libraries or can be obtained online at:

<http://www.lrc.state.ky.us/kar/TITLE401.HTM>

### **Is your waste a solid waste?**

You must determine if your waste is a "solid waste" according to **401 KAR 31:010 Section 2**. "Solid waste" is any garbage, refuse, sludge, or other discarded material (including solids, semi-solids, liquids, and contained gaseous materials).

### **Is your waste a hazardous waste?**

If your waste is a solid waste, you must then determine if it is a hazardous waste (definition of hazardous waste 401 KAR 31:010 Section 3). It is your responsibility as a generator either to test your waste or use your knowledge of the waste to make a determination about its properties. Once you know what is in your waste, you can then determine if it is considered it to be hazardous

### **Who is a generator?**

Every dry cleaner facility that produces hazardous waste is considered a generator. A generator means any person, by site, whose act or process produces waste pursuant **KRS 224.01-010**.

## **Steps To Determine & Identify Proper Management of Hazardous Waste**

### **Step 1: How to Do Waste Determination**

Generators are required to make hazardous waste determination. Determination of whether or not a waste is a hazardous waste can be done through one of the following

- Listed hazardous waste - 401 KAR 31:040
- Knowledge of materials and processes used
- Use MSDSs
- Talk to product suppliers and manufacturers
- Read label on products
- Compare product and process information to the listed hazardous waste descriptions
- Laboratory analysis

- Consider all objects that come in contact with hazardous waste

## Counting Your Waste

All wastes are considered generated as soon as you remove them from use. This means that filters are counted when they are removed from the cleaning machine. Still bottoms are counted when they exit the distillation unit. Dirty liquid solvent is counted when it is removed from the cleaning machine for transfer to the distillation unit. In addition, products can become subject to the waste management regulations if you quit operating the dry cleaning equipment for more than 90 days.

If you remove dirty liquid solvent from the cleaning machine and transfer it by hand to a distillation unit, the entire weight of the solvent must be counted as generated hazardous waste. In addition, you must register with the HWB as a recycler.

If your dry cleaning equipment and distillation unit are combined (hard piped), you will only need to count the still bottoms that exit the cleaning unit as generated hazardous waste. In addition, you won't need to register as a recycler. As long as the liquid solvent remains in your dry cleaning equipment, then it is considered to be a product in use and is not regulated as a waste.

If your business uses perchloroethylene or Valclene®, then you must count the weight of the dirty filter cartridge as generated F002 hazardous waste. In addition, still bottoms are regulated as generated F002 hazardous waste.

Well-drained filter cartridges or drained filter muck are considered "solids." If you use a petroleum solvent, it is likely to meet the criteria for ignitable solids; therefore, they are usually

hazardous wastes. Also, be sure, that these wastes do not fail the TCLP; if they do, they are hazardous wastes.

It is recommended that when you count your hazardous waste, you attempt to identify the largest amount you will ever generate in a calendar month. For instance, you may wish to use the months of October or November to determine how much waste your business would likely produce since those are traditionally the busiest months for dry cleaners.

The easiest way to determine your monthly waste is to use your manifests from the hazardous waste facility. You can also estimate your monthly waste by using the following rule of thumb:

- One 55-gallon drum can hold approximately 440 lbs (200 kg)
- One 15-gallon drum can hold approximately 120 lbs (55 kg)

**References: 401 KAR 31:005, Section 1(111) and KRS 224.01-010 for definition of the term generator; 401 KAR 31:010, Section 4(3); and 401 KAR 31:010, Section 6(3)(b).**

## Rules on Mixing Hazardous Wastes

Listed wastes cannot be diluted. For example, when a listed waste comes into contact with non-listed filter cartridges (for example), the entire contaminated filter cartridge becomes a listed hazardous waste. Thus, the weight of both the filter and the spent perchloroethylene it contains are counted as the generated hazardous waste F002.

Conversely, characteristic wastes can be diluted to lose their hazardous characteristics. For example, when an ignitable petroleum solvent mixes with a diatomaceous earth filter, the contaminated filter usually doesn't exhibit the ignitability

characteristic. The filter can be disposed as a non-hazardous solid waste.

It is important to know that mixing any hazardous waste after it is generated to make it non-hazardous is considered treatment and treatment requires prior approval from the Division of Waste Management (DWM-HWB).

## Step 2: Determine Your Generator Status

Your generator status is determined by the amount of hazardous waste you produce in each calendar month of the year. Waste amounts cannot be averaged. There are three categories of hazardous waste generators.

The hazardous waste requirements differ for these three types of generators, which are:

- **Conditionally Exempt Small Quantity Generator (CESQG)** - generates less than 100 kg of hazardous waste in a calendar month (220 lbs)
- **Small Quantity Generator (SQG)** - generates between 100 and 1000 kg of hazardous waste per month (220 to 2200 lbs).
- **Large Quantity Generator (LQG)** - generates more than 1000 kg (more than 2200 lbs) of hazardous waste per month.

HAZARDOUS WASTE COUNTING				
Type of Hazardous Waste	Dry Cleaner A (Waste)	Does This Count?	Dry Cleaner B (Waste)	Does This Count?
Lint	3 pounds	Yes	10 pound	Yes
Water From water separator	10 gal @ 8.34 pounds per gal equals 83.4 pounds	Yes	30 gallons@ 8.34 pounds per gallon, equals 150.2 pounds	Yes
Aerosol cans	2 pounds	Yes	0	Yes
Fluorescent lamps/tubes	2 pounds	Yes	2 pounds	Yes
Spent solvents and solvent containing rags (from spill cleanup)	1 pound	Yes	2 pounds	Yes
Unused solvents and cleaning products that will be thrown away	5 pounds	Yes	4 pounds	Yes
Paint and solvent from building maintenance	5 pounds	Yes	5 pounds	Yes
Spill Debris containing Solvents	2 pounds	Yes	5 pounds	Yes
Sludge containing perc	2 pounds	Yes	20 pounds	Yes
Filters containing perc	1 pound	Yes	6 pounds	Yes
Sludge from evaporator	2 pounds	Yes	25 pounds	Yes
Total of hazardous waste generated during that one month	108.4 pounds	CESQG (Generator Category)	245.8 pounds	SQG (Generator Category)

Most dry cleaners in Kentucky are CESQG or SQG. LQG and SQG must comply with additional regulatory requirements and these could be found at 401 KAR Chapter 32.

Your company will need to comply with the regulations based on your registration status. In other words, if you are registered as a Small Quantity Generator, you must comply with Small Quantity Generator regulations even if you sometimes generate less than 220 pounds in a month.

**References: 401 KAR 31:010 Section 5(1) and 401 KAR 32:010 Section 1(7).**

### Registration Requirements

CESQG are not required to register with the HWB. If you are CESQG and want an EPA ID Number, you must submit a Hazardous Waste Activity Form (**DEP 7037**) to the HWB. There is no fee for CESQG registration and the Certificate of Registration has no expiration date.

Both SQG and LQG are required to obtain an EPA ID Number and re-register annually. In addition to submitting the completed registration forms, both SQG and LQG must pay a minimum \$300 annual registration fee and file an annual report and assessment return.

The registration fee shall be made payable to the Kentucky State Treasurer. See schedule 1 of the registration instructions to find out what your total registration fee is. If you are unsure of your fee, contact **William Schneider at 502.564.6716, ext. 276, or by e-mail at William.Schneider@ky.gov**

**References: 401 KAR 31:010, Section 5; 401 KAR Chapter 32, KRS 224.46-012 and KRS 224.46-580.**

### Registration as Recycler

Establishments that use a distillation unit that is not hard piped to their dry cleaning unit must register annually as a recycler. CESQGs are exempt from the \$300 recycler registration fee, but must register the recycling activity annually. SQG and LQG are subject to the recycler registration fee (\$300 minimum for generator registration plus \$300 for recycling).

Establishments that operate a distillation unit that is an integral part of the dry cleaning unit are not considered “recyclers” and are not required to register as a recycler.

**References: 401 KAR 31:010, Section 6(3); 401 KAR 39:080 (fees)**

### Registration for Treatment On-Site

As a generator, you are allowed to treat hazardous waste on-site if you comply with the requirements found in 401 KAR 31:030 Section 6. Also Application Requirements for Treatment On-Site Requests checklist can be found in our website [www.waste.gov](http://www.waste.gov) for additional information or you could contact John Jump at 502-564-6716, ext. 620, or via email at [John.Jump@ky.gov](mailto:John.Jump@ky.gov). Establishments that have a Treatment on-site approval from the HWB must register annually this activity and pay \$300 for this activity as part of their registration. ***REMEMBER on-site treatment requires prior approval from the HWB.***

### What is Treatment?

“Treatment” is defined according to 401 KAR 38:005 Section 1(287) and KRS 224.01-010 as:



*“Any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste nonhazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduce volume. Such term includes any activity or processing designed to change the physical form or chemical composition of hazardous waste so as to render it nonhazardous.”*

Some examples of treatment are:

- ✓ Stabilization
- ✓ Mixing waste
- ✓ Evaporation
- ✓ Wastewater treatment
- ✓ Deactivation
- ✓ Neutralization
- ✓ Polymerization

**REMEMBER-- treatment on-site requires prior approval from the HWB.**

### Modifications to the Registration

For as long as a facility has a current/valid Certificate of Registration, the information submitted must be kept up-to-date. This includes activity changes, adding/deleting waste streams, contact person change, etc. This is done by again submitting a Registration of Hazardous Waste Activity form. The form must be completed in its entirety, as each registration **supersedes** the previous one. Conditionally Exempt Small Quantity Generators are exempt from modification fees. Small and Large Quantity Generators must pay modification fees (\$50

minimum). The facility is required to submit a modified registration form not later than 30 days following the change(s).

**Reference: 401 KAR 32:010, Section 3**

### Step 3: Hazardous Waste Storage Requirements

Hazardous waste must be stored in containers that are:

- Marked with the date upon which each period of accumulation begins;
- Labeled or clearly marked with the words “hazardous waste”;
- In good condition and made of or lined with materials compatible with the waste;
- Closed during storage except when waste is being added or removed;
- Not opened, handled or stored in a manner which may rupture them or cause them to leak; and
- Inspected weekly for evidence of leaks or deterioration, and the inspections documented in a log.

SQGs may accumulate hazardous waste for up to 180 days.

- This may be extended up to 270 days if waste must be transported at least 200 miles to a treatment, storage and disposal (TSD) facility.

### Step 4: Transportation and Disposal of Hazardous Waste

#### Use of Manifests

A hazardous waste manifest is a shipping form, completed by the generator that accompanies each shipment of hazardous waste when it is transported off-site. Manifests are required of all SQG and LQG sending waste off-site.

#### Frequently Found Hazardous Waste Violations in Dry Cleaners

1. Failure to do hazardous wastes determination;
2. Failure to label and date containers;
3. Failure to keep containers closed and in good condition;
4. Failure to maintain manifest and Land Disposal Restriction (LDR) documents (recordkeeping);
5. Failure to designate an emergency coordinator;
6. Failure to post emergency information;
7. Improper disposal of hazardous waste; *Example*, throwing wastes in the trash;
8. Drying out dry cleaning filters;
9. Stored wastes on-site for longer than the regulations allows – *Example: more than 180 days for SQGs*.
10. Treat hazardous waste on-site without prior approval from the HWB.

When managing hazardous waste and determining generator status the generator must look at the total of all hazardous waste produced.

In addition to completing the manifest form and sending the signed copies with the waste shipment via the transporter, the SQG must keep copies of the manifest for at least three years. These copies prove that your company is in compliance with the requirements. State inspectors will ask to see your records during regular, unannounced inspections. Records should be kept in such a way that the inspector can determine when the shipment was sent off-site and that the signed copy from the facility was received within 30 days.

If your dry cleaner doesn't receive the signed copy from the facility within 30 days of the day you sent it off-site with the transporter, you are obligated to investigate. You should call the transporter and facility to determine where the waste shipment is located and why the signed copy from the facility has not been received. If you determine that the shipment did not reach the destination facility, or you still do not have a signed copy of

the manifest within 45 days, you must submit an Exception Report to the Division of Waste Management. There is no form for the Exception Report, however, your letter to the division must contain all the information you have discovered about the problems with that shipment.

All manifest copies must be kept for a period of three years from the date the waste was accepted by the initial transport.

**References: 401 KAR 32:030 (use of the manifest); 401 KAR 32:040, Section 3 (Exception Reports); and 401 KAR 32:100 (instructions for completing the manifest).**

### **Land Disposal Restrictions (LDRs)**

An LDR form must accompany hazardous waste to the disposal facility. Hazardous waste cannot be landfilled without first meeting certain treatment standards. The LDR form notifies the disposal facility that waste meets treatment standards or does not meet treatment standards. The LDR form must be completed even if the waste is to be recycled. The disposal facility will treat the waste prior to land disposal if necessary. The generator must identify on the LDR form what constituents are present in the waste - this can be done by generator knowledge and/or analytical testing. All LDR forms must be kept on file after the date the waste was sent to the treatment storage and disposal facility as recordkeeping.

**Reference: 401 KAR Chapter 37**

### **Solvent & Waste Disposal**

No dry cleaning solvent, wastes containing dry-cleaning solvent, separator water, or contact water can be disposed in such a manner that it is discharged onto the land or into the waters of

the state. This means that municipal sewer systems, storm drains, floor drains, septic tanks, dumpsters, boilers, cooling-towers, etc., cannot be used to dispose of wastes that contain solvent. This rule applies to both perc and petroleum solvents.

## **Liability**

Although a waste disposal or recycling firm is often hired to manage the hazardous waste generated at a dry-cleaning facility, liability for the waste does not end when it leaves the dry cleaner's site. It is still the dry cleaner's responsibility to ensure that the hazardous waste is properly managed and disposed of or recycled.

## **Annual Reports**

LQG and SQG must submit annual reports to the HWB which identify all the hazardous wastes generated during the previous calendar year. Reports are always due on March 1<sup>st</sup>. Forms are mailed directly to each registered LQG and SQG in January. If you do not receive your annual report form, you should contact the HWB.

For more information on annual reports, please contact **William Schneider at 502-564-6716, ext. 276, or by e-mail at William.Schneider@ky.gov**

**Reference: 401 KAR 32:040, Section 2**

## **Hazardous Waste Assessment**

LQG and SQG must submit a Hazardous Waste Assessment and appropriate payment to the Kentucky State Treasurer. The return is always due on March 1st. Forms are mailed directly to

each registered LQG and SQG in January. If you do not receive your assessment return, you should contact the Division of Waste Management.

For more information on annual reports and assessments please contact **William Schneider at 502-564-6716, ext. 276, or by e-mail at William.Schneider@ky.gov.**

**Reference: KRS 224.46-580**

## **EPA ID Identification Number**

EPA ID numbers are required of all large quantity and small quantity generators. They are voluntary for conditionally exempt small quantity generators, although some treatment, storage and disposal facilities require all customers to obtain EPA ID Number.

## **DOT Requirements (Transportation)**

Before sending hazardous waste off-site containers must be labeled, packaged, marked and placarded in accordance Department of Transportation (DOT) regulations.

Also, transporters of hazardous waste should have an EPA ID number and use a hazardous waste manifest for all hazardous waste shipped off-site.

## **Step 5: Personnel Training**

Dry cleaners that are LQG and SQG must train their employees to be familiar with proper waste handling and emergency procedures relevant to their job duties. Besides, OSHA requires employers to inform their employees about the hazard an employee could be facing with hazardous waste.

## Step 6: Emergency Procedures

A LQG and SQG must have at least one employee either on the premises or on call at all times designated as the emergency coordinator. The emergency coordinator or his/her designee must respond to any emergencies that arise. The following information must be posted next to a telephone that is available to all employees who handle hazardous waste and who are capable of contacting outside assistance:

- The name and telephone number of the emergency coordinator;
- The location of fire extinguishers, spill control material, and fire alarm(s); and
- The telephone number of the fire department and emergency response teams

Emergency equipment, such as portable fire extinguishers and spill control equipment must be immediately available to employees in the event of an emergency. Emergency equipment must be tested/inspected weekly and maintained as necessary. An emergency equipment testing log must be kept by the facility.

## Additional Requirements to be in Compliance

### Equipment REQUIRED for Compliance:

- Spill containment under solvent storage areas
- Spill containment under all waste-containing solvent storage areas
- Spill containment under on-site waste containing solvent treatment units
- Closed container solvent transfer system on all perc machines
- Emergency spill cleanup materials available on-site

- NO underground storage tanks for storing solvent or waste containing solvent allowed
- Operation and maintenance manuals for each on-site treatment unit equipment.

### Recordkeeping REQUIRED for Compliance:

Must be available on site for 3 years

- Monthly perc purchases receipts
- Perc 12-month running solvent purchase calculation log
- Leak Detection and repair logs
- Emergency information sign completed and posted in clear view of a telephone
- Manifest receipts pertaining to hazardous waste pickup and disposal
- On-site waste treatment log
- Monthly waste generation logs (separator and other contact water and machine filter change)
- On-site waste treatment unit inspection logs
- Hazardous waste inspection log

### Recordkeeping RECOMMENDED Ensuring Facility Compliance:

- MSDS for all solvents, spotting agents, detergent additives, and any other chemicals used and/or stored on site (Note: This is required by OSHA.)
- Hazardous waste manifest log (includes all waste shipped off-site such as still bottoms, muck, lint)
- Solvent usage calculation
- Receipts for solvent purchases
- Receipts pertaining to leak detection inspections, maintenance and repair

### On-site Wastewater Management:

Dry cleaners are prohibited from discharging solvent-contaminated wastewater from the water separation process of the dry cleaning machine to any drain, sewer, septic system,

boiler, waters of the state, or by pouring on the ground. Contact water is any water that has come in contact with the perc solvent; such as separator water, vacuum pump condensate, and mop water. Contact water is viewed as hazardous waste. Even a small amount of perc in contact water discharged to concrete sewer lines can leak into the soil through cracks in the sewer line or directly through concrete.

#### **Discharge of treated wastewater:**

Wastewater treatment units should treat perc contaminated wastewater (contact water) to below 0.7 ppm and discharge the water in such a way that no visible liquid deposition or accumulation is present and no nuisance condition is created. All treated wastewater should be discharged as water vapor outside the building.

#### **On-site Waste Treatment & Equipment Requirements:**

- An evaporator may be used to treat separator and other contact water instead of shipping it as hazardous waste as long as these units have a prior approval from the HWB. Please refer to the treatment on-site section for more information.

#### **Recordkeeping and other requirements for the on-site hazardous waste treatment units:**

- All on-site waste treatment units must be leak-free, properly operated and maintained according to manufacturer's operational and maintenance manuals, and be located within appropriate secondary containment.
- All operational and maintenance manuals for the on-site waste treatment unit must be kept on-site at all times.
- Follow the schedule for inspecting and monitoring operating dry cleaning equipment, secondary

containment, and filter changes. Keep this schedule on site.

- Maintain an on-site waste treatment maintenance log.
- Have at least a two months' supply of wastewater treatment filters should be stored on-site.
- Maintain a monthly waste generation log for all hazardous waste.
- Be sure to change out the filters monthly and record the date that the filters were changed.

#### **Closed Container Solvent Transfer System:**

Facilities that use perc must use a closed container solvent transfer system when transferring perc from one vessel to another. Solvent distributors are also required to use these systems when delivering solvent to a machine. Perc may no longer be added directly to the drum.

#### **Develop a Contingency Plan**

A contingency plan is a plan that prepares your dry cleaner facility for any accidents that could possibly occur. A contingency plan is a tool that can be thought of as a set of steps and answers to a series of "what if" questions. For example: "What if I have a spill of hazardous waste or one of my containers burst out?"

One of RCRA requirement for the contingency plan is: emergency phone numbers and locations of emergency equipment must be posted near telephones. This means that next to the phone you must post the name of an employee to act as the emergency coordinator, have fire extinguishers, etc. LQG are required to have developed a contingency plan, however, if you are a SQG or CESQG and you treat your hazardous waste on-site you must comply with the LQG requirements including this one. For more information regarding

development of contingency plan, please contact John Jump at 502-564-6716, ext. 620 or via e-mail at [john.jump@ky.gov](mailto:john.jump@ky.gov)

Although a written contingency plan is not required for SQGs or CESQGs, the HWB strongly recommends having a plan.

## **References and Web-links**

*Plain English Guide for Perc Cleaners\*\**

<http://www.epa.gov/opptintr/dfe/pubs/garment/perc/>

*RCRA in Focus: Dry Cleaning\*\**

[www.epa.gov/epaoswer/hazwaste/id/infocus/dryclean.pdf](http://www.epa.gov/epaoswer/hazwaste/id/infocus/dryclean.pdf)

\*\*These documents are guidance for the federal regulations. State regulation could be more stringent than federal regulation, so always review your Kentucky KARs for compliance.

## **Regional DEP Waste Field Offices**

### **Bowling Green Regional Office**

1508 Westen Avenue  
Bowling Green, KY 42104  
Phone: (270) 746-7475  
Fax: (270) 746-7865  
Fax to e-mail: (502) 696-3922

The Bowling Green Regional Office is responsible for the following counties: Allen, Barren, Butler, Edmonson, Grayson, Hart, Logan, Ohio, Simpson and Warren

### **Columbia Regional Office**

102 Burkesville Street  
Columbia, KY 42728  
Phone: (270) 384-4735  
Fax: (270) 384-5199  
Fax to e-mail: (502) 696-3923

The Columbia Regional Office is responsible for the following counties: Adair, Boyle, Casey, Clinton, Cumberland, Green, LaRue, Lincoln, Marion, Metcalfe, Monroe, Nelson, Pulaski, Russell, Taylor, Washington and Wayne

### **Florence Regional Office**

8020 Veterans Memorial Drive, Suite 110  
Florence, KY 41042  
Phone: (859) 525-4923  
Fax: (859) 525-4157  
Fax to e-mail: (502) 696-3924

The Florence Regional Office is responsible for the following counties: Boone, Bracken, Campbell, Carroll, Gallatin, Grant, Henry, Kenton, Owen, Pendleton and Trimble

### **Frankfort Regional Office**

643 Teton Trail, Suite B  
Frankfort, KY 40601  
Phone: (502) 564-3358  
Fax: (502) 564-5043  
Fax to e-mail: (502) 696-3932

The Frankfort Regional Office is responsible for the following counties: Anderson, Bourbon, Clark, Estill, Fayette, Franklin, Garrard, Harrison, Jessamine, Madison, Mercer, Nicholas, Powell, Robertson, Scott and Woodford

### **Hazard Regional Office**

233 Birch Street  
Hazard, KY 41701  
Phone: (606) 435-6022  
Fax: (606) 435-6025  
Fax to e-mail: (502) 696-3933

The Hazard Regional Office is responsible for the following counties: Breathitt, Floyd, Johnson, Knott, Lee, Leslie, Letcher, Magoffin, Martin, Owsley, Perry, Pike and Wolfe

### **London Regional Office**

875 South Main Street  
London, KY 40741  
Phone: (606) 330-2080  
Fax: (606) 330-2097

The London Regional Office is responsible for the following counties: Bell, Clay, Harlan, Jackson, Knox, Laurel, McCreary, Rockcastle and Whitley

### **Louisville Regional Office**

9116 Leesgate Road  
Louisville, KY 40222  
Phone: (502) 429-7120

Fax: (502) 429-7125  
Fax to e-mail: (502) 696-5119

The Louisville Regional Office is responsible for the following counties: Breckinridge, Bullitt, Hardin, Jefferson, Meade, Oldham, Shelby and Spencer

**Madisonville Regional Office**

625 Hospital Drive  
Madisonville, KY 42431  
Phone: (270) 824-7532  
Fax: (270) 824-7070  
Fax to e-mail: (502) 696-3926

The Madisonville Regional Office is responsible for the following counties: Caldwell, Christian, Crittenden, Daviess, Hancock, Henderson, Hopkins, McLean, Muhlenberg, Todd, Union and Webster

**Morehead Regional Office**

344 Christy Creek Road  
Morehead, KY 40351  
Phone: (606) 784-6634  
Fax: (606) 784-4544  
Fax to e-mail: (502) 696-3927

The Morehead Regional Office is responsible for the following counties: Bath, Boyd, Carter, Elliott, Fleming, Greenup, Lawrence, Lewis, Mason, Menifee, Montgomery, Morgan and Rowan

**Paducah Regional Office**

130 Eagle Nest Drive  
Paducah, KY 42003  
Phone: (270) 898-8468  
Fax: (270) 898-8640

Fax to e-mail: (502) 696-3928

The Paducah regional office is responsible for the following counties: Ballard, Calloway, Carlisle, Fulton, Graves, Hickman, Livingston, Lyon, McCracken, Marshall and Trigg



Facility Name: \_\_\_\_\_ EPA ID #: \_\_\_\_\_ Alt# \_\_\_\_\_

Inspector Name: \_\_\_\_\_

Hazardous Waste Generation Log					
	Week 1	Week 2	Week 3	Week 4	Totals
Lint					
Water from water separator					
Aerosol cans					
Fluorescent lamps/tubes					
Filters and filter media					
Separator water					
Spent solvents and solvent containing rags (from spill cleanup)					
Spent carbon and cartridges from carbon absorbers					
Cook powder residues					
Spot cleaner					
Still residues from distillation units					
Unused solvents and cleaning products that will be thrown away					
Paint and solvent from building Maintenance					
Spill debris containing solvents					
Others : _____					
Total for this month					

Perc Log					
	Week 1	Week 2	Week 3	Week 4	Totals
Perc carry out from previous month					
New perc purchases					
Perc returned from other agencies					
Total for this Month					

2008

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**Remember:**  
 As a waste generator, you must:

- Determine if your waste is a hazardous waste, and then:
- Ensure that your waste is managed properly.

The recordkeeping of the information on these tables may help you, as generator, with your hazardous waste determinations and compliance. However, remember the waste generator has the ultimate responsibility for any mismanagement of its hazardous waste. Failure to do an adequate waste determination is the number one violation cited by hazardous waste inspectors. For this reason, the division is encouraging you to keep all documentation you could possibly have to use to show the proper management of your hazardous waste and your business even though you may not be required by the RCRA regulations.

<b>Notes</b>

